

2010 2 28

Plaintiff

Civil Action No. 04-11994-RWZ

Defendant.

Pursuant to Federal Rules of Civil Procedure 26(a)(i), Plaintiff submits the following in discover disclosures:

1. Dale Endris: President, Dennis East International, Inc.
17 Shad Hole Road
Dennisport, MA
508-760-4545
2. Richard Dalzell: Dennis East International, Inc.
17 Shad Hole Road
Dennisport, MA
508-760-4545
3. Robert Anderson: CFO, Dennis East International, Inc.
17 Shad Hole Road
Dennisport, MA
508-760-4545
4. Karen Benson: Sales Representative, Dennis East International, Inc.
17 Shad Hole Road
Dennisport, MA
508-760-4545

B. Document Description:

1. Dale Endris - President of the corporate plaintiff who ultimately has access to discoverable documents including, without limitation, copyright registrations, correspondence with Defendant, invoices from Plaintiff to Defendant, purchase orders, cancellation notices and other documents relating to business transactions between Plaintiff and Defendant.
2. Richard Dalzell - Plaintiff's employee with responsibility for and control of documents relating to copyright registrations which are the subject of this litigation.
3. Robert Anderson - Plaintiff's employee with responsibility for and control of documents relating to invoices, payments, cancellations of orders and other financial information relating to this litigation.
4. Karen Benson - Plaintiff's salesperson who had majority of contact with Defendant and is in possession of purchase orders and other documents relating to Plaintiff's history of dealings with Defendants.

C. Damages:

1. Since damages prayed for by Plaintiff require computation of Defendant's profits, Plaintiff is unable to determine damages at this time. However, Richard Anderson, Plaintiff's CFO, has in his possession, documents which evidence Plaintiff's losses due to cancellation of orders by Defendant.

Respectfully submitted,

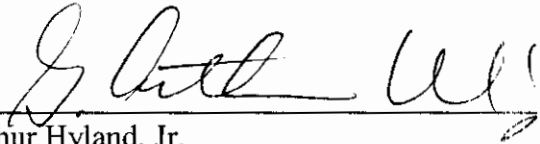
DENNIS EAST INTERNATIONAL, INC.

Date: 9/13/05

By G. Arthur Hyland, Jr.
G. Arthur Hyland, Jr., its Attorney
243 South Street
P.O. Box M
Hyannis, MA 02601
(508) 775-3116
BBO#545488

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of September, 2005, copies of Plaintiff's First Request for Production of Documents Under Rule 34 and Plaintiff's Initial Discovery Disclosures (126(a)(i)) was served on Defendant's counsel via first class mail, postage prepaid to: Nicholas Alexander, Esq., MORRISON MAHONEY LLP, 250 Summer Street, Boston, MA 02210 and Michael J. Racette, Esq., MORRISON MAHONEY LLP, 250 Summer Street, Boston, MA 02210.



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